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Attorneys for Plaintiff
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY DAVID FLORES,
 aka "Anton David," and
 ANNA RENE MOORE,

Defendants.

No. 2:22-CR-00593-PA-1

STIPULATION AND JOINT REQUEST FOR
 AN AMENDMENT TO THE PROTECTIVE
 ORDER

[PROPOSED ORDER FILED SEPARATELY]

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of California and Assistant United States Attorney Andrew M. Roach, and defendant Anthony David Flores, also known as "Anton David" ("defendant"), both individually and by and through his counsel of record, Ambrosio E. Rodriguez (collectively, the "parties"), for the reasons set forth below, request that the Court enter this amendment (the "Amendment") to the protective order (the "Protective Order"), entered at Docket #16 on February 20, 2023, governing the use and dissemination of (1) personal identifying information ("PII") of

1 real persons pursuant to Federal Rule of Criminal Procedure
2 Rule 16(d)(1), (2) medical or health information, and (3) material
3 that may contain information within the scope of the Privacy Act.

4 Introduction and Grounds for Amendment to Protective Order

5 1. The Court previously entered the Protective Order in this
6 case for defendant Anthony David Flores on February 20, 2023.
7 (Dkt. 16.)

8 2. The parties now wish to amend the Protective Order to
9 allow defendant Anthony David Flores to possess and review certain
10 discovery outside the presence of his counsel, while still
11 preventing further dissemination of (1) PII of real persons pursuant
12 to Federal Rule of Criminal Procedure Rule 16(d)(1), (2) medical or
13 health information, and (3) material that may contain information
14 within the scope of the Privacy Act beyond the needs of this case.

15 3. The purpose of this Amendment to the Protective Order is
16 to (a) allow the government to comply with its discovery obligations
17 while protecting this sensitive information from unauthorized
18 dissemination, and (b) provide the defense with sufficient
19 information to adequately represent defendant.

20 4. All other terms of the Protective Order will remain in
21 force.

22 Terms of the Amendment to the Protective Order

23 5. The parties jointly request the Court enter this Amendment
24 to Protective Order, which will permit the government to produce
25 Confidential Information in a manner that preserves the privacy and
26 security of third parties. The parties agree that the following
27 conditions in the Protective Order will serve these interests:
28

1 a. In addition to the other designations permitted in
2 the Protective Order, the government is authorized to provide
3 defense counsel and defendant with Confidential Information marked
4 with the following legend: "PRODUCED TO DEFENDANT - DO NOT
5 DISTRIBUTE." The government may put that legend on the digital
6 medium (such as DVD or hard drive) or simply label a digital folder
7 on the digital medium to cover the content of that digital folder.
8 The government may also redact any PII contained in the production
9 of Confidential Information.

10 b. Defendant and the Defense Team agree to use the
11 Confidential Information, including, but not limited to, documents
12 marked "PRODUCED TO DEFENDANT - DO NOT DISTRIBUTE," solely to
13 prepare for any pretrial motions, plea negotiations, trial, and
14 sentencing hearing in this case, as well as any appellate and post-
15 conviction proceedings related to this case.

16 c. Defendant and the Defense Team shall not permit
17 anyone other than the Defense Team or defendant to have possession
18 of or review any material marked "PRODUCED TO DEFENDANT - DO NOT
19 DISTRIBUTE." Defendant may possess copies of the Confidential
20 Information with the designation "PRODUCED TO DEFENDANT - DO NOT
21 DISTRIBUTE," and review those documents outside the presence of
22 counsel; however, defendant is expressly forbidden from distributing
23 or showing any material produced to defendant and marked "PRODUCED
24 TO DEFENDANT - DO NOT DISTRIBUTE" to any other person.
25 Notwithstanding the foregoing, defendant is still forbidden from
26 possessing or reviewing any material marked "CONFIDENTIAL
27 INFORMATION -- SUBJECT TO PROTECTIVE ORDER" outside the presence of
28 the Defense Team.

1 d. Defendant agrees to return all materials given to
2 defendant and marked "PRODUCED TO DEFENDANT - DO NOT DISTRIBUTE" to
3 defense counsel at the end of the proceedings. Defense counsel will
4 then maintain or destroy these materials in accordance with the
5 terms of the Protective Order.

6 e. Accordingly, the parties have agreed to request that
7 the Court enter this Amendment to Protective order in the form
8 submitted herewith.

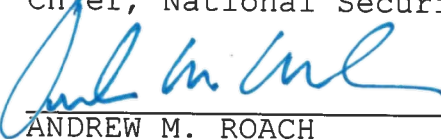
9 IT IS SO STIPULATED.

10 Dated: June 25, 2023

Respectfully submitted,

11 E. MARTIN ESTRADA
12 United States Attorney


13 ANNAMARTINE SALICK
14 Assistant United States Attorney
15 Chief, National Security Division

16 
ANDREW M. ROACH
Assistant United States Attorney

17 Attorneys for Applicant
18 UNITED STATES OF AMERICA

19 DATED:


20 6/20/23

21 
AMBROSIO E. RODRIGUEZ

22 Attorney for Defendant
23 ANTHONY DAVID FLORES

24 DATED:

25 6/20/23

26 
ANTHONY DAVID FLORES
27 Defendant
28